

**Information Required to Assess the
WGI Audit of Paragon Analytical,
Fort Collins, CO**

EPA Information Gathering Meeting August 7, 2001

Information that EPA Contracts should compile/determine if available:

1. Does the Contract Quality Assurance Plan require a yearly audit of laboratories used for sample analysis? If so, what reports (audits reports, memos, etc.) are available for review?

Information EPA needs from WGI to clarify the contents of the audit report:

1. For the contents of the audit report, provide a temporal frame of reference for the length of time the findings have been of concern by (as applicable):
 - a) indicating when the last time WGI audited Paragon and providing EPA with a copy of the previous audit report;
 - b) determining what, if any, other agencies or organizations may have audited Paragon during the time that WGI sent samples to the laboratory. If other audits from other agencies or organizations were performed, provide the audit reports and Paragon's audit report responses to EPA.
2. It appears that WGI has done a respectable job performing the audit. However, there WGI appears to have had difficulty relating the findings or concerns about Paragon Analytical in the checklist attached to the audit report. Based upon the report, it is unclear whether the findings implicate problems for a single analytical method (i.e., ICP metals or volatile organic compounds) or whether the findings are global problems. For example, on page 1 of 9 of the Audit Checklist, Item 3 identifies a classification of "unsatisfactory" was applied to the question: "Are MDLs run on each instrument and each matrix?". WGI must clarify the findings to adequately define the bounds of the concerns relating to each finding before EPA can determine the magnitude of the concerns about data previously generated by Paragon Analytical.

Information to be obtained by EPA for VBI70:

1. Determine the timeframe when samples were analyzed.
2. Was the target analyte list only As and Pb? Or were there other metals/parameters?
3. What media are affected?
4. Determine the level of validation was performed on the data set: full validation, cursory,

etc. If there was a mix, what was the frequency for each level of validation.